

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN AND
FOR PALM BEACH COUNTY, FLORIDA

CASE NO.: 502015CA002369AN

EDMUNDO PEREZ, as Personal Representative
of the Estate of ASHLEY PEREZ, Deceased, on
behalf of the Estate of ASHLEY PEREZ and the
lawful survivors of the Decedent, To Wit:
EDMUNDO PEREZ, as surviving spouse,
AMALIA PEREZ, as surviving minor daughter,
and DYLAN PEREZ, as surviving minor son,

Plaintiff,

vs.

WELLINGTON REGIONAL MEDICAL
CENTER, INC., individually and on behalf of its
agents, apparent agents, servants and employees;
JAMES JUSTIN GOAD, M.D.; PALM BEACH
GENERAL SURGERY d/b/a THE CENTER FOR
ADVANCED SURGICAL CARE; ST. MARY'S
MEDICAL CENTER, INC., d/b/a ST. MARY'S
MEDICAL CENTER; WILLIAM JEFFREY
DAVIS, D.O.; PALM BEACH TRAUMA
ASSOCIATES, individually and on behalf of its
partners, agents, apparent agents, servants and
employees; ROBERT BORREGO, M.D., P.A.,
independently and as general partner of PALM
BEACH TRAUMA ASSOCIATES; AHMED EL-
HADDAD, M.D., P.A.; DIMITER B. Hristov,
M.D., P.A., independently and as general partner
of PALM BEACH TRAUMA ASSOCIATES;
RAYMOND HENDERSON, SR., M.D.; and
RAYMOND HENDERSON, SR., M.D., P.A.,

Defendants.

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PLAINTIFF'S EXPERT WITNESS LIST

Plaintiff, EDMUNDO PEREZ, as Personal Representative of the Estate of ASHLEY
PEREZ, Deceased, on behalf of the Estate of ASHLEY PEREZ and the lawful survivors of the
Decedent, To Wit: EDMUNDO PEREZ, as surviving spouse, AMALIA PEREZ, as surviving

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minor daughter, and DYLAN PEREZ, as surviving minor son, by and through the undersigned attorneys, and hereby lists Plaintiff's expert witnesses for trial as follows:

1. Andrew J. Bierhals, M.D.
342 Trailhead Way
Dardenne Prairie, MO 63368

Dr. Bierhals is a radiologist who will testify to the interpretation and relevance of the radiology studies in Ashley Perez's case.

Dr. Bierhals' testimony is given on the grounds of his education, training and expertise, his review of the medical records, evidence, as well as the medical literature and standards of practice applicable to the care rendered and area of testimony involved.

A copy of Dr. Bierhals' Curriculum Vitae is attached hereto. No report has been issued.

2. Kenneth Deck, M.D.
South Orange County Surgical Medical Group
24411 Health Center Drive, Ste. 350
Laguna Hills, CA 92653

Dr. Deck is a general surgeon who will testify to the negligence of Dr. James Goad and Dr. Raymond Henderson, and the causal connection of their neglect to the death of Ashley Perez.

Dr. Deck's testimony is given on the grounds of his education, training and expertise, his review of the medical records, evidence, as well as the medical literature and standards of practice applicable to the care rendered and area of testimony involved.

A copy of Dr. Deck's Curriculum Vitae is attached hereto. No report has been issued.

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3. Paul B. Hofmann, Ph.D.
Hofmann Healthcare Group
346 Rheem Blvd., Ste. 101
Moraga, CA 94556

Dr. Hofmann is a hospital administrator who will testify as to the negligence of Wellington Regional Medical Center, St. Mary's Medical Center, and William Jeffrey Davis, D.O., and the casual connection of their neglect to the death of Ashley Perez.

Dr. Hofmann's testimony is given on the grounds of his education, training and expertise, his review of the medical records, evidence, as well as the medical literature and standards of practice applicable to the care rendered and area of testimony involved.

A copy of Dr. Hofmann's Curriculum Vitae is attached hereto. No report has been issued.

4. Michael Hughes, M.D.
Hughes Family Psychiatry Center, PA
3162 Commodore Plaza, Ste. 2G
Miami, FL 33133

Dr. Hughes board certified psychiatrist who is expected to testify as to the negative impact to the emotional, physical and psychiatric well-being of Ashley Perez's children as a result of wrongful death of their mother, Ashley Perez. He will also testify to the past, present and future damages that this had, and will have on the children and their family.

Dr. Hughes' testimony is given on the grounds of his education, training and expertise, his review of the medical records, evidence, as well as the medical literature and standards of practice applicable to the care rendered and area of testimony involved.

A copy of Dr. Hughes' Curriculum Vitae is attached hereto. No report has been issued.

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5. Frank Manning, M.D.
260 3rd Street North
Naples, FL 34102

Dr. Manning is an OB/GYN who will testify as to the standard of care met by attending physician Berto Lopez, M.D. in the care and treatment of Ashley Perez.

Dr. Manning's testimony is given on the grounds of his education, training and expertise, his review of the medical records, evidence, as well as the medical literature and standards of practice applicable to the care rendered and area of testimony involved.

A copy of Dr. Manning's Curriculum Vitae is attached hereto. No report has been issued.

6. John G. O'Brien, M.D.
3055 E. Horse Mountain Circle
Heber City, UT 84032

Dr. O'Brien is a general trauma surgeon who will testify as to the negligence of Dr. James Goad, Dr. Raymond Henderson, and trauma/surgical critical care specialists Dr. Borrego, Dr. El-Haddad, and Dr. Hristov, and the casual connection of their neglect to the death of Ashley Perez.

Dr. O'Brien's testimony is given on the grounds of his education, training and expertise, his review of the medical records, evidence, as well as the medical literature and standards of practice applicable to the care rendered and area of testimony involved.

A copy of Dr. O'Brien's Curriculum Vitae is attached hereto. No report has been issued.

7. Scott J. Sherman, M.D., Ph.D.
5761 Camino Padre Isadoro
Tucson, AZ 94556

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Dr. Sherman is a neurologist who will testify as to the causation and damages resulting from each defendant's involvement in this matter.

Dr. Sherman's testimony is given on the grounds of his education, training and expertise, his review of the medical records, evidence, as well as the medical literature and standards of practice applicable to the care rendered and area of testimony involved.

A copy of Dr. Sherman's Curriculum Vitae is attached hereto. No report has been issued.

8. David Williams, Ph.D.
Florida Economics Consulting Group, Inc.
11601 SW 61st Court
Miami, FL 33156

Dr. Williams is an expert economist who is expected to provide an economic loss analysis.

Dr. Williams' testimony is given on the grounds of his education, training and expertise, his review of the medical records, evidence, as well as the medical literature and standards of practice applicable to the care rendered and area of testimony involved.

A copy of Dr. Williams' Curriculum Vitae is attached hereto. No report has been issued.

9. Jennifer E. Melvin, LCSW
600 Sandtree Drive, Ste. 202C
Palm Beach Gardens, FL 33403

Ms. Melvin is a treating expert who is a licensed clinical social worker and continues to provide grief counseling and bereavement services to the Perez family. Ms. Melvin will testify as to the emotional and psychological impact the loss of Ashley Perez has had on the children and family as a whole.

A copy of Ms. Melvin's BIO is attached hereto. No report has been issued.

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10. Without waiving objections, all experts listed by the Defendants.
11. Impeachment and rebuttal witnesses as necessary, without waiving any objections thereto.
12. Plaintiff reserves the right to amend this list prior to trial upon proper notice to the Defendants.

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via E-Serve to all Counsel on the attached list, this 16th day of August, 2017.

/a/ Adam S. Hecht
Adam S. Hecht
Florida Bar No.: 64307
Attorney E-Mail(s): ahecht@searcylaw.com and
nbullard@searcylaw.com
Primary E-Mail: _hechtteam@searcylaw.com
Searcy Denney Scarola Barnhart & Shipley, P.A.
2139 Palm Beach Lakes Boulevard
West Palm Beach, Florida 33409
Phone: (561) 686-6300
Fax: (561) 383-9455
Attorney for Plaintiff(s)

COUNSEL LIST

Keith J. Puya, Esquire
eservice@puyalaw.com;
kpuya@puyalaw.com
Keith J. Puya, Esquire
kpuya@puyalaw.com; kari@puyalaw.com;
scheduling@puyalaw.com;
csayre@puyalaw.com
Law Offices of Keith J. Puya, P.A.
4880 Donald Ross Road, Suite 225
Palm Beach Gardens, FL 33418
Phone: (561)-408-3772
Fax: (561)-408-3759
Attorneys for Ahmed El-Haddad, M.D.

Scott E. Solomon, Esquire
ssolomon@falkwaas.com;
tperez@falkwaas.com;
smanoah@falkwaas.com
Falk Waas Hernandez Cortina Solomon &
Bonner, P.A.
135 San Lorenzo Avenue, Suite 500
Coral Gables, FL 33146
Phone: (305)-447-6500
Fax: (305)-447-1777
Attorneys for James J. Goad, M.D. & Palm
Beach General Surgery, LLC d/b/a The
Center for Advanced Surgical Care

Jonathon P. Lynn, Esquire
Jlynn@chl-law.com; Cmallard@chl-law.com
Chimpoulis Hunter & Lynn, P.A.
150 S Pine Island Road, Suite 510
Plantation, FL 33324
Phone: (954)-463-0033

Fax: (954)-463-9562
Attorneys for Raymond Henderson
Bruce M. Ramsey, Esquire
wpb-pleadings@bclmr.com
John C. Webber, Esquire
bmr@bclmr.com; pamb@bclmr.com;
jcw@bclmr.com
Billing Cochran Lyles Mauro & Ramsey, P.A.
1601 Forum Place, Suite 400
West Palm Beach, FL 33401
Phone: (561) 659-5970
Fax: (561) 659-6173
Attorneys for Robert Borrego, M.D.

Jay Cohen, Esquire
jcohen@jaycohenlaw.com
Jeffrey L. Blostein, Esquire
jblostein@jaycohenlaw.com;
sbaker@jaycohenlaw.com;
kflores@jaycohenlaw.com;
DTiffin@jaycohenlaw.com;
pleadings@jaycohenlaw.com
The Law Office of Jay Cohen, P.A.
100 SE 3rd Avenue, Suite 1100
Fort Lauderdale, FL 33394
Phone: (954) 449-8700
Fax: (954) 763-6093
Attorneys for Wellington Regional Medical
Center